

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

**IN RE:
RHEALA JACOBO**

§ CASE NO. 18-31266-HCM

§

§

§

§

§

§

§

§

Debtor(s). **§ Chapter 13**

**TRUSTEE'S MOTION TO ENTER DISCHARGE
AFTER COMPLETION OF PLAN PAYMENTS**

This pleading request relief that may be adverse to your interest.

**If no timely response is filed within 21 days from the date of services,
the relief requested herein may be granted without a hearing being held.**

A timely filed response is necessary for a hearing to be held.

To the Honorable H. Christopher Mott, United States Bankruptcy Judge:

STUART C. COX, Standing Chapter 13 Trustee's (hereinafter "Trustee") Motion to Enter Discharge respectfully alleges:

1. Debtor has timely submitted a pre-discharge questionnaire, in the form specified by the Trustee pursuant to the First Joint Standing Order Relating to Chapter 13 Case Administration Under BAPCPA in the El Paso and Waco Divisions, Exhibit #4. The questionnaire is attached hereto for notice purposes. F.R.B.P. § 1007(b)(8).
2. Trustee moves the Court to enter the discharge pursuant to F.R.B.P. § 2002(f)(11), absent any timely request to delay the entry of the discharge. 11 U.S.C. § 1328(h).
3. There is no default Order attached as the court enters its own form of Order.

Relief Sought

Trustee prays this Court enter the discharge, after notice, and hearing if necessary.
Trustee further prays that Trustee be granted such other and further relief as is just.

DATED this 5th of August 2021.

Respectfully submitted,

/s/Stuart C. Cox
Standing Chapter 13 Trustee
SBN: 00794992
Stuart@ch13elpaso.com

/s/Lucille Zavala
Senior Staff Attorney for Stuart C. Cox
SBN: 22251370
Lucillez@ch13elpaso.com
1760 N. Lee Trevino Drive
El Paso, TX 79936
(915) 598-6769 telephone
(915) 598-9002 facsimile

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing *Trustee's Motion to Enter Discharge after Completion of Plan Payments* was served upon the parties listed below [and to the parties on the attached service list] by United States Mail, first class, postage prepaid on August 05, 2021.

UNITED STATES TRUSTEE
P.O. BOX 1539
SAN ANTONIO, TX 78295-1539

RHEALA JACOBO
7049 WESTWIND DRIVE APT. #1023
EL PASO, TX 79912

NEVAREZ LAW FIRM
MICHAEL NEVAREZ, ATTORNEY
EL PASO, TX 79913

/s/Stuart C. Cox
Stuart C. Cox
/s/Lucille Zavala
Lucille Zavala

Label Matrix for local noticing
0542-3
Case 18-31266-hcm
Western District of Texas
El Paso
Wed Aug 4 17:08:08 CDT 2021

U.S. BANKRUPTCY COURT
511 E. San Antonio Ave., Rm. 444
EL PASO, TX 79901-2417

Alexandra Jacobo
940 N. Murray, Apt. #8
Colorado Springs, CO 80915-3425

Amazon Prime
PO Box 960013
Orlando, FL 32896-0013

Capital One
Attn: Bankruptcy
PO Box 30253
Salt Lake City, UT 84130-0253

(p)JPMORGAN CHASE BANK N A
BANKRUPTCY MAIL INTAKE TEAM
700 KANSAS LANE FLOOR 01
MONROE LA 71203-4774

Comenity Bank/Lane Bryant
Attn: Bankruptcy
PO Box 182125
Columbus, OH 43218-2125

Comenity Bank/OneStopPlus.com
4590 E Broad St
Columbus, OH 43213-1301

Credit Collection Services
c/o Wells Fargo Bank
725 Canton St.
Norwood, MA 02062-2679

Discover Bank
Discover Products Inc
PO Box 3025
New Albany, OH 43054-3025

Discover Financial
PO Box 3025
New Albany, OH 43054-3025

ECMC
PO BOX 16408
St. Paul, MN 55116-0408

Ent Fed Cu
Attn: Bankruptcy
PO Box 15819
Colorado Springs, CO 80935-5819

Indian Springs Apartments--Greystar
7049 Westwind Dr.
El Paso, TX 79912-1730

Lane Bryant
Comenity Bank
PO Box 182273
Columbus, OH 43218-2273

MCM
PO Box 60578
Los Angeles, CA 90060-0578

Midland Funding
Attn: Bankruptcy
PO Box 939069
San Diego, CA 92193-9069

Midland Funding LLC
PO Box 2011
Warren, MI 48090-2011

(p)NEW MEXICO EDUCATIONAL ASSISTANCE FOUNDATI
BANKRUPTCY DEPT
PO BOX 93970
ALBUQUERQUE NM 87199-3970

PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541-1021

(p)PORTFOLIO RECOVERY ASSOCIATES LLC
PO BOX 41067
NORFOLK VA 23541-1067

Surgical Anesthesia Management of Texas
c/o iQuantified Management Services, LLC
2821 S. Parker Rd., Ste. 305
Aurora, CO 80014-2748

United States Trustee - EP12
U.S. Trustee's Office
615 E. Houston, Suite 533
P.O. Box 1539
San Antonio, TX 78295-1539

Wells Fargo Bank
PO Box 10438
Macf8235-02f
Des Moines, IA 50306-0438

Wells Fargo Bank, N.A.
Wells Fargo Card Services
PO Box 10438, MAC F8235-02F
Des Moines, IA 50306-0438

Michael R. Nevarez
The Law Offices of Michael R. Nevarez
P.O. Box 12247
El Paso, TX 79913-0247

Rheala Gay Jacobo
7049 Westwind Drive, Apt. #1023
El Paso, TX 79912-1731

Stuart C. Cox
El Paso Chapter 13 Trustee
1760 N. Lee Trevino Dr.
El Paso, TX 79936-4565

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Chase Card	New Mexico Student Loan Guarantee Corporatio	(d)New Mexico Student Loans
Attn: Correspondence Dept	Attn: Bankruptcy Dept.	New Mexico Student Loans
PO Box 15298	PO Box 93970	PO Box 27020
Wilmington, DE 19850	Albuquerque, NM 87199-3970	Albuquerque, NM 87125

Portfolio Recovery Associates, LLC	(d)Portfolio Recovery Associates, LLC	End of Label Matrix
P.O. Box 12914	POB 41067	Mailable recipients 27
Norfolk, VA 23541	Norfolk VA 23541	Bypassed recipients 0
		Total 27

Exhibit #4

DEBTOR QUESTIONNAIRE UPON COMPLETION
OF PLAN PAYMENTS IN BANKRUPTCY CASE NO. 18-31266-HCM

CIRCLE THE CORRECT ANSWERS:

1. YES / ☒ NO

I/We have completed an instructional course concerning personal financial management, as described in 11 U.S.C. § 111, provided by the following entity:

Stuart C. Cox, Chapter 13 Standing Trustee

1760 N. Lee Trevino

El Paso, TX 79936

2. YES / ☒ NO

I/We have received a discharge in a Chapter 7, 11 or 12 bankruptcy case within four years of the date I/we filed this bankruptcy case.

3. YES / ☒ NO

I/We have received a discharge in another Chapter 13 bankruptcy case within two years of the date I/we filed this bankruptcy case.

4. YES / ☒ NO

Did you elect to use State exemptions? If yes, then the following two questions must be answered.

a. YES / ☒ NO

I/We had, either at the time of the filing of this bankruptcy case, or at the present time, equity in excess of \$155,675 (\$311,350 if married and filing this case jointly) in the type of property described in 11 U.S.C. § 522(p)(1). [generally, your homestead]

b. YES / ☒ NO

There is currently pending any proceeding in which I [in an individual case] or either of us [in a joint case] may be found guilty of a felony [a felony is an offense punishable by a minimum term of imprisonment of more than one year] of the kind described in 11 U.S.C. § 522(q)(1)(A) [one where the circumstances of the felony demonstrated that the filing of this case was an abuse of the Bankruptcy Code] or liable for a debt of the kind described in 11 U.S.C. § 522(q)(1)(B) [violation of federal or state securities laws or regulations or orders issued thereunder; fraud, deceit or manipulation in a position of trust in connection with the purchase or sale of certain registered securities; civil remedies under the racketeering statute; or criminal acts, intentional civil injuries, or willful or reckless misconduct causing serious physical injury or death to another in the preceding five years].

5. a. YES (NO)

I/We have been required by a judicial or administrative order or by statute to pay any domestic support obligation, as defined in 11 U.S.C. § 101(14A) [a debt owed to or recoverable by a spouse, former spouse, or child or the child's parent or legal guardian, or a government unit, for alimony, maintenance or support of those persons, that was established by a separation agreement, divorce decree, property settlement, or order of the court or, where applicable, a determination of a governmental unit] either before this bankruptcy case was filed, or at any time after the filing of this bankruptcy case.

IF THE ANSWER TO QUESTION 5a IS "YES," THEN ALL OF THE FOLLOWING QUESTIONS MUST BE COMPLETED/ANSWERED:

b. YES / NO

NA

I/We certify that, prior to the date of this Questionnaire, I/we have paid all amounts due under any domestic support obligation [as defined in 11 U.S.C. § 101(14A)] required by a judicial or administrative order or by statute, including amounts due before this bankruptcy case was filed, to the extent provided for by my/our Plan. The name and address of each holder of a domestic support obligation is as follows:

c. My/Our most recent address is:

7049 Westwind Dr.
Apt. #1023
El Paso, Tx 79912

d. The name and address of my/our most recent employer(s) is:

EPISD
Herrera Elementary School
350 Coates
El Paso, Tx 79932

e. The following creditors hold a claim that is not discharged under 11 U.S.C. § 523(a)(2) or

(a) (4), or a claim that was reaffirmed under 11 U.S.C. § 524(c):

I/we acknowledge that all statements contained herein are true and accurate. The Court may rely on the truth of each of these statements in determining whether to grant me/us a discharge in this Chapter 13 bankruptcy case. The Court may revoke my discharge if the statements herein are not accurate.

I/We declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on February 27, 2021.

Rheala A. Jacobo
Debtor

Debtor